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Attorneys for Debtors and Reorganized Debtors

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No. 19 -30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF STEPHEN L. SCHIRLE
IN SUPPORT OF MOTION TO REDACT
DOCUMENTS FILED IN SUPPORT OF
THIRD SUPPLEMENTAL APPLICATION
PURSUANT TO 11 U.S.C. §§ 327(a) AND
328(a) AND FED. R. BANKR. P. 2014(a) AND
2016 FOR AUTHORITY TO RETAIN AND
EMPLOY PRICEWATERHOUSECOOPERS
LLP AS MANAGEMENT, TAX, AND
ADVISORY CONSULTANTS TO THE
DEBTORS NUNC PRO TUNC TO PETITION
DATE**

[No Hearing Requested]

1 I, Stephen L. Schirle, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information, and belief:

4 I am employed as Chief Counsel, Litigation, in the legal department of Pacific Gas and Electric
5 Company (the “**Utility**”), a wholly-owned subsidiary of PG&E Corporation (“**PG&E Corp.**” and
6 together with Utility, the “**Debtors**”). I joined the Utility in 1998 and have worked on litigation since
7 that time. I obtained my Juris Doctorate from the UCLA School of Law in 1980 and was admitted to
8 the State Bar of California that same year.

9 I am generally knowledgeable and familiar with the Debtors’ day-to-day operations, including
10 the Debtors’ professional engagements with PricewaterhouseCoopers LLP (“**PwC**”). The facts set forth
11 in this Declaration are based upon my personal knowledge, my review of relevant documents, and
12 information provided to me by the Debtors’ other employees or the Debtors’ legal, restructuring, and
13 financial advisors. If called upon to testify, I would testify to the facts set forth in this Declaration.

14 This Declaration is submitted in support of the *Motion to Redact Documents Filed in Support of*
15 *Third Supplemental Application Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Fed. R. Bankr. P.*
16 *2014(a) and 2016 for Authority to Retain and Employ PricewaterhouseCoopers LLP as Management,*
17 *Tax, and Advisory Consultants to the Debtors Nunc Pro Tunc to Petition Date* (the “**Redaction Motion**”)
18 filed concurrently herewith, which seeks authority to redact certain confidential information subject to
19 attorney–client privilege and the attorney work product doctrine that is the subject of the *Third*
20 *Supplemental Application Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Fed. R. Bankr. P. 2014(a)*
21 *and 2016 for Authority to Retain and Employ PricewaterhouseCoopers LLP as Management, Tax, and*
22 *Advisory Consultants to the Debtors Nunc Pro Tunc to Petition Date* (the “**Third Supplemental**
23 **Application**”), filed concurrently herewith.¹

24 PwC performed a number of engagements for the Debtors prior to the Petition Date and PwC has
25 developed institutional knowledge about the Debtors’ businesses, operations, accounting systems, and
26 other material information. PwC is party to a number of contracts with the Debtors; however the Debtors
27

28 ¹ Capitalized terms used but not otherwise herein defined shall have the meanings ascribed to such terms
in the Redaction Motion or the Third Supplemental Application.

1 are only seeking to redact information from two of such contracts. Redacted copies of the Third
2 Supplemental MSA Contracts are annexed to the *Declaration of Daniel Bowman in Support of Third*
3 *Supplemental Application Pursuant to 11 U.S.C. §§ 327(a) and 328(a) and Fed. R. Bankr. P. 2014(a)*
4 *and 2016 for Authority to Retain and Employ PricewaterhouseCoopers LLP as Management, Tax, and*
5 *Advisory Consultants to the Debtors Nunc Pro Tunc to Petition Date* (the “**Bowman Declaration**”),
6 filed concurrently herewith.

7 In addition to the relevant terms governing PwC’s work and other critical services that have been,
8 and will continue to be, performed by PwC for the benefit of the Debtors (which are described in detail
9 in the Third Supplemental Application), certain Third Supplemental MSA Contracts describe work to
10 be performed at the direction of counsel and information subject to the attorney–client privilege and the
11 attorney work product doctrine. The Debtors have narrowly tailored their request to redact by limiting
12 the redactions to information subject to the attorney–client privilege and the attorney work product
13 doctrine, rather than all commercially sensitive information. Therefore, the Debtors seek to file certain
14 Third Supplemental MSA Contracts with the limited redactions described above.
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1 Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury, that the foregoing is true
2 and correct.

3 Dated: July 22, 2020

4 Respectfully submitted,

5 By: /s/ Stephen L. Schirle
6 Stephen L. Schirle
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